

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Entergy Louisiana, LLC	AI #:	83898	TEMPO Activity No:	PER2008001
Facility Name:	Waterford 1 & 2 Generating Plant	Remarks Submitted by:	Christee Herbert		PER2009002
Permit Writer:	Christopher Smith	Permit Writer Email address:	Christopher.smith@la.gov		PER2007003

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Requirement 120”, or “Section II Air Permits Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information **must be submitted**. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating Requirements not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – DO NOT COMPLETE THIS SECTION. This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.
- **DO NOT USE THIS FORM TO SUBMIT COMMENTS DURING THE OFFICIAL PUBLIC COMMENT PERIOD.**

Permit Reference	Remarks	Air Permits Division Response (for official use only)
IF KKKK remains specific requirement 115 needs to change.	Comment: 40 CFR 60.4400 requires annual compliance testing	The draft permit was changed as requested.
Specific requirements Specific requirement 115 Page 13 of 19	Requested Action: Change the text “Conduct an initial performance test for NO _x , as required in 40 CFR 60.8” to the following: “Conduct an initial performance test for NO _x , as required in 40 CFR 60.8. Subsequent NO _x performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test).”	

Specific requirements Specific requirement 134 Page 15 of 19	Comment: There is a typographical error in the text of specific requirement 134. Requested Action: Change "LM?2" to the appropriate text for clarification.	The draft permit was changed as requested.
Specific requirements Specific requirement 158 Page 18 of 19	Comment: The Diesel Emergency Generator was deleted. Requested Action: Remove the text "and the diesel emergency generator each month" from this requirement.	The draft permit was changed as requested.
Specific requirements Specific requirement 165 Page 18 of 19	Comment: Specific requirement 165 does not apply to this unit as it has been classified as existing with no standards or reporting requirements.	The draft permit was changed as requested.
Statement of Basis I. Applicant	Comment: Delete Specific Requirement 165. Requested Action: The zip code is incorrect.	The draft statement of basis was changed as requested.
Statement of Basis Table 1 EQT 016, D1	Comment: For NESHAAPS Subpart YYY (40 CFR 63 YYY), the number should be a "1" and not a "3". The MACT standard still applies to the unit, but it has been reclassified as "existing" and does not have any standards or reporting requirements.	The change has been made to Table 1 as requested regarding the applicability of NESHAAP YYY to EQT016, D1 – Dispatchable Turbine.
Statement of Basis Table 1 EQT 016, D1	Requested Action: Delete the "3" and add a "1" for NESHAAPS Subpart YYY	
Statement of Basis IX, Table 2 EQT 016, D1	Comment: For NESHAAPS Subpart YYY (40 CFR 63 YYY) The standard should be Applicable as the MACT still applies to the unit, but it has been reclassified as "existing" and does not have any standards or reporting requirements.	The requested action was not made. However, a note has been added to EQT016 that although NESHAAP YYY does apply, it does not have any applicable requirements under the NESHAAP because it is an existing turbine.
Statement of Basis IX, Table 2 EQT 016, D1	Requested Action: Delete this item from Table 2 as this table is designed for sources with an explanation as exempt or non-applicability status. Please also note Existing stationary combustion turbines do not have to submit an initial notification.	

		The draft statement of basis was changed as requested.
	<p>Comment: NESHAPS Subpart YYYY does apply however there are not standards or reporting requirements.</p> <p>Statement of Basis</p> <p>MACT Requirements paragraph.</p> <p>Requested Action: Delete the following “National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.” Add the following “The Dispatching Turbine meets the existing stationary combustion turbine definition described in the National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines (Turbine MACT). Existing stationary combustion turbines are not subject to any requirements in the Turbine MACT or Subpart A of Part 63 [40 CFR 63.6090(b)(4)].”</p>	<p>Comment: Arsenic, chromium VI, and nickel emissions changed. Why was there a change in these emissions?</p> <p>Requested Action: Please provide an explanation as to why there was any change in these emissions since the only sources added were a lube oil tank and a Wet Surface Area Cooler on D1 to the insignificant activities list and these sources do not emit these pollutants. Also, the only source deleted was a diesel emergency engine which did not emit these pollutants either. If these changes are in error, please delete them and retain the current permitted values.</p>
	<p>Statement of Basis</p> <p>Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):</p>	<p>Comment: NESHAPS Subpart YYYY does apply however there are not standards or reporting requirements.</p>
		<p>Requested Action: In the second sentence delete “National Emission Standards for Hazardous Air Pollutants (NESHAP) and” before the phrase Prevention of Significant Deterioration. Add “National Emission Standards for Hazardous Air Pollutant (NESHAP) does apply however There are no applicable requirements.</p> <p>Title V Permit Renewal Section IV, Page 3</p>

<p>Title V Permit Renewal Section X Page 6 Table I EQT 016, DI</p>	<p>Comment: For NESHAPS Subpart VVVY (40 CFR 63 VVVY) the number should be a "1" and not a "3". The MACT standard still applies to the unit, but it has been reclassified as "existing" and does not have any standards or reporting requirements.</p> <p>Requested Action: Delete the "3" and add a "1" for NESHAPS Subpart VVVY</p>
<p>Title V Permit Renewal Section XI Page 6 Table 2 EQT 016, DI</p>	<p>Comment: For NESHAPS Subpart VVVY (40 CFR 63 VVVY) The standard should be Applicable as the MACT still applies to the unit, but it has been reclassified as "existing" and does not have any standards or reporting requirements.</p> <p>Requested Action: Delete this item from Table 2 as this table is designed for sources with an explanation as exempt or non-applicability status. Please also note Existing stationary combustion turbines do not have to submit an initial notification.</p>
<p>Title V Permit Renewal Page 2 *VOC LAC 33-III Chapter 51 Toxic Air Pollutants (TAPs):</p>	<p>Comment: Arsenic, chromium VI, and nickel emissions changed. Why was there a change in these emissions?</p> <p>Requested Action: Please provide an explanation as to why there was any change in these emissions since the only sources added were a lube oil tank and a Wet Surface Area Cooler on DI to the insignificant activities list and these sources do not emit these pollutants. Also, the only source deleted was a diesel emergency engine which did not emit these pollutants either. If these changes are in error, please delete them and retain the current permitted values.</p> <p>The requested action was not made. However, a note has been added to EQT016 that although NESHAP VVVY does apply, it does not have any applicable requirements under the NESHAP because it is an existing turbine.</p> <p>The draft permit was changed as requested.</p> <p>Comment: The PM10 TPY emission rate should be 0.43 and not 0.043 TPY. The initial permit and this Renewal permit contained this typographical error. This was not an issue before as the unit had not yet been constructed and was not emitting any PM10. Since the unit is now operable, this typographical error needs to be corrected.</p> <p>Requested Action: Change the PM10 TPY rate to 0.43.</p>

<p>Comment: The SO2 TPY value for SCN 0009 changed from 63.61 to 49.60.</p> <p>Request Action: Why did the Natural gas operating scenario SO2 rate change? The SO2 emissions for Oil fired unit (WF4, D1) were reduced by 14 tons for Low Mass Emitter status (Changed form 39 Tons to 25 tons, which is a 14 ton difference). There was no natural gas emissions change. Please provide an explanation for the reduction or revert back to the previously permitted value.</p> <p>TPOR0145_83898_20081_01082010.PDF Emission rates for Criteria Pollutants SCN 0009 OP-NG</p>	<p>SCN0009 represents the total SO2 emissions from Waterford 1 & 2 when the facility's C1 and C2 units are burning natural gas, and includes the SO2 emissions from the C3 (which only burns natural gas), and also SO2 emissions from D1 (which only burns distillate oil).</p> <p>SCN0010 represents the total SO2 emissions from Waterford 1 & 2 when the facility's C1 and C2 units are burning fuel oil, and includes the SO2 emissions from the C3 (which only burns natural gas), and also SO2 emissions from D1 (which only burns distillate oil).</p> <p>Because Entergy has chosen to use the LME method to determine emissions on D1, the SO2 limit for GRP0008 is set at 25 instead of the previous 39, according to 40 CFR 75.19(a)(1)(i)(A)(1).</p> <p>Comment: specific requirement 150 allows 60 hours for SU/SD.</p> <p>INVENTORIES EQT 0017, D1 SU/SD</p> <p>Requested Action: Change 50 hr/yr to 60 hr/yr to be consistent with the LME calculations and specific requirement 150.</p>
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